IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

PYROTECHNICS MANAGEMENT, INC.,)
Plaintiff,) Civil Action No. 2:19-cv-00893-RJC
v.)
XFX PYROTECHNICS LLC and fireTEK,)
Defendants.)

PLAINTIFF PYROTECHNICS MANAGEMENT, INC.'S MOTION TO COMPEL DISCOVERY

Plaintiff, Pyrotechnics Management, Inc. (hereinafter "Pyrotechnics") by its counsel, Dentons Cohen & Grigsby P.C., and pursuant to Federal Rules of Civil Procedure 37(a)(1) and 37(a)(3)(B), hereby moves this Honorable Court to compel Defendant fireTEK to respond to certain discovery requests for the reasons set forth in Plaintiff's Brief in Support of its Motion to Compel Discovery, which was filed contemporaneously with this Motion and is incorporated by reference as though fully set forth herein.

WHEREFORE, Plaintiff requests that the Court grant this Motion in accordance with the proposed Order attached hereto.

Respectfully submitted:

DENTONS COHEN & GRIGSBY P.C.

By: /s/ Lucy E. Hill

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Dated: May 11, 2021

CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2021 pursuant to Federal Rule of Civil Procedure 5 and Local Rule 5.6 of the United States District Court for the Western District of Pennsylvania, the foregoing Plaintiff's Motion to Compel Discovery and proposed order have been served by electronic means through the Court's transmission facilities on the counsel of record. Parties may access this filing through the Court's ECF system.

/s/ Lucy E. Hill